

Attachment to Btn. 171-405

Equal Opportunity for Women -- The Federal Women's Program

1. Background. In October 1967, Executive Order 11375 amended Executive Order 11246 and sex was added to other prohibited forms of discrimination in Federal employment (race, color, religion and national origin). The Civil Service Commission responded to this new order by establishing the Federal Women's Program to enhance employment and advancement opportunities for women. In August 1969, Executive Order 11478 integrated the Federal Women's Program into the overall Equal Employment Opportunity Program and, in addition raised the focus of attention on the Federal Women's Program by placing it under the stewardship of Directors of Equal Employment Opportunity. In March 1972, Public Law 92-261, the EEO Act of 1972 brought Federal employees and agencies under the equal employment opportunity provisions of the Civil Rights Act of 1964 for the first time and gave the Civil Service Commission additional enforcement powers to insure that all personnel actions in Government are free from discrimination. This statutory base for equal opportunity in the Federal Government applies to all Federal employees and provides a statutory base for the Federal Women's Program.

2. The Federal Women's Program Coordinator.

A. Designation of FWP Coordinator.

Civil Service Commission regulations implementing P. L. 92-261 require that Federal agencies designate a FWP Coordinator to advise the Director of EEO on matters affecting the employment and advancement of women and to assure that necessary specific actions are taken regarding equal opportunity for women. The designation of a FWP Coordinator in no way diminishes the overall responsibility of the Director of EEO for affirmative action for equal opportunity for all persons or the agency head's responsibility for the total integration of equal opportunity into all facets of personnel management. Rather, the designation of a FWP Coordinator provides a vital resource to assist in identifying problem areas impeding the selection and advancement of women in a particular agency as well as ways and means of overcoming these barriers. The person so designated should have empathy for and understanding of the special concerns of women in the employment situation and be

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able to effectively communicate with top management officials, community representatives, employee groups and organizations, and male and female employees of the Federal work force. The Civil Service Commission Qualifications Standards for the Equal Employment Opportunity Series (GS-160) include the requirements for both full-time and part-time FWP Coordinators.

B. Allocation of Resources to the Federal Women's Program and Organizational Structure.

(1) P. L. 92-261 requires that Federal agencies allocate sufficient resources to a results-oriented Equal Employment Opportunity program at both headquarters and field level. The Civil Service Commission in reviewing agency affirmative action plans and accomplishment reports will also review the allocation of resources to the total Equal Employment Opportunity program, including the Federal Women's Program. Such factors as the designation of FWP Coordinators at headquarters and field levels; whether they are full-time or part-time; if they are part-time the percentage of time they devote to FWP activities; the caliber of individuals selected as FWP Coordinators; and the evidence of a visible Federal Women's Program at the agency will be taken into consideration in ascertaining whether or not sufficient resources have been devoted to the Federal Women's Program. As a general rule, we think that an agency employing a total of 7,500 persons should designate a full-time FWP Coordinator. In addition, installations of a significant size should have a FWP Coordinator, again on a full or part time basis.

(2) Where the FWP Coordinator is a full-time employee, she (he) should be assigned to the staff of the Director of EEO. If the FWP Coordinator is a part-time position, the Coordinator will usually be located in the organizational component of the regular position but all duties performed relating to equal opportunity for women are under the direct supervision of the Director of EEO at agency level. Similar organizational relationships should exist in the field.

(3) Agencies often find it helpful to provide program support to the FWP Coordinator by designating committees comprised of women and men from various organizational components. The persons so designated should provide a good cross-section of the agency population and include men, women, minorities, non-minorities and a grade-level range.

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C. Guidelines for the FWP Coordinators

Since the initial establishment of the Federal Women's Program, the number of FWP Coordinators, their level of competence, and their contributions and accomplishments to agency progress have shown significant growth. The most valuable contribution a FWP Coordinator can make is by assessing where women are in the agency, where they are not and why not, and what can be done to assure equal opportunity for all persons within that particular agency. As a minimum, the FWP Coordinator's responsibilities should cover the following areas:

(1) Resource Material

The FWP Coordinator should be familiar with the status of women in the workforce in the nation, in the Federal Government, and especially, in the Federal agency which the Coordinator serves. Of course, knowledge of the total EEO program, including the discrimination complaint processing procedures, is also essential.

Some specific references, by no means all inclusive, would include:

Executive Order 11246 of September 24, 1965.

Executive Order 11375 of October 13, 1967.

Executive Order 11478 of August 8, 1969.

FPM Chapter 713

EEO Regulations

FPM Chapter 292, Subchapter 2-9

CSC Pamphlet "Toward Equal Opportunity in Federal Employment"

CSC Pamphlet "Upward Mobility for Lower Level Employees -- Suggested Goals & Actions"

CSC Pamphlet "Expanding Opportunities in the Federal Government"

CSC Pamphlet "The Federal Women's Program: A Point of View"

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CSC Pamphlet "Employee Training in the Federal Service"
Pamphlet T-7, February 1970.

"Bibliography - Equal Opportunity in Employment - Women"

CSC Quarterly Newsletter "Women In Action"

"Study of Employment of Women in the Federal Government
1971" SM 62-07

Department of Labor pamphlet "Facts About Women's
Absenteeism and Labor Turnover"

"1969 Handbook of Women Workers" (Women's Bureau
Bulletin 294)

"Underutilization of Women Workers" Department of Labor
(1971 revised)

Women's Bureau leaflet 53 "Calling All Women in the
Federal Service"

Film - "What's The Matter With Alice?"
NEWSFILM USA
21 East 46th Street
New York, New York 10036

Film - "The Supervisor and EEO"
DATAFILMS
2625 Temple Street
Los Angeles, California 90026

In summary, the FWP Coordinator should either have a copy of or be able to conveniently reference all Civil Service Commission issuances on the equal opportunity program; a good supply of Department of Labor (Women's Bureau) reference material and in addition all the agency program directives and guidelines on equal opportunity. In addition she (he) should be familiar with FPM Chapters on employment, merit promotion, training, and statistics for a general background knowledge of the total personnel management program and how the Federal Women's Program fits into the total structure.

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(2) Use of Statistics

One means of assessing progress and identifying problem areas is by in-depth analysis of the agency's workforce. The FWP Coordinator should look closely at such factors as:

- Agency population by grade and pay level (male-female).
- Population of apprentice programs (male-female).
- Training statistics (male-female).
- Promotions (male-female) by occupation and grade-level.
- Turnover rate (male-female).
 - o Professional and technical turnover
 - o Clerical turnover
- Agency average grade-level (male-female).
- Occupational population (male-female).
- Skills available (male-female) in the agency's workforce, in the Federal workforce and in the nation's workforce.

Reference: Department of Labor Occupational Outlook Handbook 1972-1973 edition

- Award nominees and selections (male-female).

(3) Problem Identification.

After review of all resource material and careful analysis of the workforce, major problem areas will undoubtedly become evident, such as a high concentration of women in grades GS-6 and below, lack of women in supervisory positions, or lack of women in higher level positions, in certain occupational areas, or in some organizational components.

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The FWP Coordinator should work with the Director of EEO or the EEO officer in developing program objectives to resolve these problem areas. Possible action items might include increased efforts to insure that women are included in training programs for mid-level, senior-level, and supervisory positions; outreach recruitment efforts to attract qualified women in selected occupations; career counseling of women in lower level positions to orient them to opportunities within the agency; and many others discussed in further detail in following paragraphs. The crucial issue is that the FWP Coordinator must identify the paramount problem areas and construct the corrective action accordingly.

(4) Gaining Federal Women's Program Support.

The success of the Federal Women's Program in each agency depends on personal support and commitment on the part of the agency head; the degree of management's awareness and participation in the program; the effectiveness of the FWP Coordinator in educating supervisors and employees on program goals and objectives; and the degree of interest and participation of the women themselves.

The program is a Government-wide program with a legislative base for which all supervisors and all employees have a responsibility. Supervisors do not have a choice on implementing certain facets of Federal equal opportunity policy and ignoring others. P. L. 92-261, the EEO Act of 1972, states that all personnel actions shall be free from discrimination which includes discrimination based on sex.

Reluctance to implement aggressive affirmative action items to assure equal opportunity for women is often based on old myths about the working woman, and on unfair stereotypes. The FWP Coordinator can do much to educate supervisors, managers, and employees in the facts to dispel these myths. If the presentation of factual evidence on women in the workforce does not sufficiently delineate the problems which may be attitudinal, the FWP Coordinator and the Director of EEO can take alternate approaches. These might include intensive training for supervisors on equal employment opportunity; or presentation

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of guest speakers from the academic world, from business and industry and from various professional disciplines to discuss the history of women in the United States, women's role in society, and women's contributions to the nation. Another reason for reluctance to implement aggressive affirmative action items is managers' attitudes that no overt discrimination is being practiced. While this might very well be true, there may be patterns of discrimination whereby certain organizational units or geographical areas have never appointed or promoted a woman above the GS-7 level. Information like this should be brought to the attention of appropriate officials so that corrective action may be taken.

Women themselves should be made aware of what the law means to them and what their responsibilities are under the law; they should be aware of who their agency FWP Coordinator is; what agency priorities have been identified in the Affirmative Action Plan; and what choices are open to them in training and career ladders. They should be informed that the Federal Women's Program is an affirmative action program designed within the context of a Merit System of employment.

The FWP Coordinator, as well as needing the support of top management and employees, requires the active support of all EEO officials and of the personnel office. Lack of cooperation hampers program accomplishments and causes expenditure of the Coordinator's time on nonproductive matters.

(5) Program Publicity.

Agency and installation FWP Coordinator's should make concerted efforts to see that the Federal Women's Program receives publicity in house organs, agency newsletters, community newspapers, professional journals and other media. Feeder information to editors should concentrate on program innovations and accomplishments; however, there is also a value in publicizing "breakthrough" appointments of women into levels or occupations traditionally thought of as "male only." Articles on the Federal Women's

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Program might include new recruitment techniques to attract qualified women; flexible work scheduling to enhance opportunities for women and others who seek part-time employment; statistics on women in certain occupations; an overview of the discrimination complaint activities, and other areas.

(6) Training.

The three major points the FWP Coordinator should be alert to in the field of training are:

- (a) Sufficient time and attention should be devoted to the Federal Women's Program in all EEO training courses for supervisors and in management development courses.
- (b) Women should receive an equal opportunity for attending all types of training courses, whether long-term or short-term, apprentice training, technical, professional, executive, or upward mobility training.
- (c) Qualified female lecturers should also be considered as trainers.
- (d) FWP Coordinators should be receiving training in EEO and Personnel Management.

(7) Expansion of Part-time Employment Opportunities.

Millions of women in the United States today are heads of families and have to work for economic reasons; millions of others want to work to help support their families and millions of others want to work to utilize their education and training outside the home. For women who have to balance home and career responsibilities, part-time employment opportunities are needed. Part-time employment opportunities are equally beneficial to young people attending school, to aged persons, and to handicapped persons and others regardless of sex. Many thousands of part-timers are already on Federal rolls responding to fluctuating workloads and agency missions. The FWP Coordinator should explore within

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her (his) agency what use is being made of part-time employment opportunities, what other possibilities exist, what flexibility there might be in work scheduling to accommodate women, students, or handicapped persons, on work weeks other than the normal 40-hour week. There is a record of fine achievements made by Federal employees who work on a part-time basis and the FWP Coordinator can provide management with information on the benefits of such arrangements.

(8) Child-Care Centers.

Under current Federal policy, Salary and Expense Funds may not be expended on child-care centers, but research funds may be used if the child-care center is mission-related. While this does restrict the development of child-care centers in Federal agencies, there are other possible areas where the FWP Coordinator may contribute and when it will be advantageous to the agency's employment situation.

For example, she (he) might, (a) survey the need for child-care centers within the agency or particular installation; (b) make available to all employees information on licensed child-care facilities within the community; (c) work with community organizations in developing child-care facilities; and (d) keep employees generally informed of policy direction, legislation, etc., on child-care matters. Also, there are certain parent costs concerning child care that are allowable tax deductions. The FWP Coordinators should inform employees in these matters.

(9) Upward Mobility.

Public Law 92-261, the EEO Act of 1972, requires among other factors, that Federal agencies provide programs of training and education which will afford employees an opportunity to acquire skills and abilities needed to compete for advancement to positions of greater responsibility. Agencies have the authority under this law and under Chapter 41 of title 5, United States Code (formerly the Government Employees Training Act), to train employees for duties they are currently performing or those which they could reasonably be expected to perform in the future. Chapter 410 of the Federal Personnel Manual provides complete details on agencies' authority for training employees in both government and non-government facilities. The concept of Upward

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Mobility requires more than just job training; however, it also requires, for example, establishing bridge jobs to provide opportunities for employees to move out of dead-end positions into those that provide opportunities for advancement. Agency affirmative action plans for EEO include provisions for Upward Mobility programs. The FWP Coordinator who is knowledgeable on the status of women in her (his) agency should participate in the development of such programs, advise on job restructuring and career ladders, and ascertain that Upward Mobility programs are alleviating the problem areas surrounding the concentration of women in lower level dead-end positions. While there are women and men who seek out administrative and clerical positions and are perfectly content to perform in these areas for as long as they plan to work, there are also women and men who have the ability, the potential and the personal commitment to seek further career opportunities commensurate with their ability. The Upward Mobility program of Federal agencies must recognize the varying aspirations of the composition of the workforce and structure jobs to allow for different avenues and different motivations while also fully meeting management's needs to accomplish the agency's mission.

The FWP Coordinator can provide valuable advice and assistance to personnel management specialists in the development and implementation of an Upward Mobility program that brings women along with men, into the mainstream of agency programs.

The FWP Coordinator should be active in developing and publicizing career counseling sources for employees at all levels throughout her (his) agency. Because many women have an especially acute need for improved career planning, the Coordinator should work with the Personnel Office, equal employment opportunity personnel, supervisors, and managers to assure that adequate occupational information and guidance are readily available to employees.

(10) Impact on Community.

The FWP Coordinator can play a vital role in increasing community awareness that Federal installations in the area

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are equal opportunity employers. She (he) can speak before women's groups and clubs, professional organizations and societies, on local radio and television shows, as well as provide information to these groups on career opportunities for women. The FWP Coordinator, working with high schools and junior high schools in the area, can participate in career days and counseling programs, and provide general information on Federal careers for women destined for college or elsewhere. The FWP Coordinator, working with colleges and universities in the area, can provide information on the need for/or existence of continued education programs and help the agency develop cooperative work-study programs when it would be advantageous.

(11) Discrimination Complaints Based on Sex.

The FWP Coordinator is designated as an agency official who receives discrimination complaints based on sex for forwarding to the Director of EEO for processing under controlling regulations. The FWP Coordinator should not become involved in the adjudication of complaints or serve as a representative for either the complainant or the agency in individual complaint cases. Rather, she (he) should monitor the complaints program by maintaining surveillance on discrimination complaint activity, ascertaining the number and type of sex discrimination complaints being filed, the origin of the complaints, the organizational location of complainants, and the corrective action being taken when deficiencies are noted. The FWP Coordinator should establish a working contact with EEO Counselors to assess whether employees or applicants approaching counselors are bringing up matters of sex discrimination that indicate problem areas that require program improvements.

(12) Program Evaluation.

The Federal Women's Program is an integral part of the overall Equal Employment Opportunity Program for which detailed Civil Service Commission evaluation guidelines have been published (CSC Bulletin No. 713-27 of November 14, 1972). The FWP must be examined in relationship to the

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total EEO program and should not be evaluated out of this context. The various FWP program components, by their very nature, are ingredients of broader program goals (i.e., Upward Mobility, EEO Counseling, Discrimination Complaint Procedures, etc.). There are, however, special issues of particular interest and because of their impact on the employment and advancement of women they are spelled out in detail in the evaluation guidelines. While overall program evaluation responsibilities may be assigned to other key agency officials, it is imperative that the FWP Coordinator be included in evaluation activities and share in evaluation findings. Only by participating in the planning, organizing and review of FWP evaluations will the FWP Coordinator be in a position to suggest or initiate action items to eliminate barriers to the full utilization of women in the workforce.

(13) Development of Equal Employment Opportunity Plan.

The Federal Women's Program Coordinator serves as an essential resource in the development of the agency's Equal Employment Opportunity Plan. Through participation in and promotion of various FWP activities she (he) has gained valuable insight into the status of women within the agency, what problems there are and how they can best be tackled. The FWP Coordinator can use this knowledge by assisting in the development of meaningful action items directed towards specific problems within the agency. Also, information gained from assessing statistical and other data on women in the workforce can be evaluated to determine whether the establishment of goals and timetables would be an appropriate action to resolve equal employment opportunity problems.

In addition to participation in the development of action items, the FWP Coordinator should also be assigned as a responsible official for those action items in the Equal Employment Opportunity Plan relating specifically to the Federal Women's Program.